

- (D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See* Local Civ. Rule 3.01 (D.S.C.).

Answer: Plaintiff has alleged that the alleged acts or omissions occurred within the Beaufort Division. Powell Defendants assert that, respectfully, this Court lacks personal jurisdiction and that none of the criteria under Local Civ. Rule 3.01 (D.S.C.) apply in this matter.

- (E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

Answer: None known at this time.

- (F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

Answer: Not applicable.

- (G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

Answer: Plaintiff's claims are allegedly based on the actions of Dominion Voting Systems, Inc. See Complaint, ECF 1, at ¶¶ 26-29.

- (H) Parties or Intervenor in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

Answer: Sidney Powell is a resident of the State of Texas. Sidney Powell, P.C. is a law firm organized under the laws of the State of Texas and with its principal place of business in Texas.

[SIGNATURE APPEARS ON NEXT PAGE]

Respectfully submitted,

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